

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>CAROLYN GARDNER</b>	:	
	:	
Plaintiff	:	CIVIL ACTION
	:	
v.	:	
	:	NO. 22-1034
<b>KUTZTOWN UNIVERSITY, <i>et al.</i></b>	:	

**STIPULATION TO EXTEND TIME FOR PLAINTIFF'S RESPONSE TO  
DEFENDANTS' CROSS-MOTION FOR SUMMARY JUDGMENT AND REPLY BRIEF  
TO DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

This stipulation between counsel for the Plaintiff, Carolyn Gardner for all Defendants that the time for Plaintiff to respond to Defendants' Cross-Motion for Summary Judgment and/or her Reply to Defendants' Response to her Partial Motion for Summary Judgment shall be extended to August 31, 2023, subject to the Court's approval.

/s/ Lorrie McKinley  
**LORRIE McKINLEY, ESQUIRE**  
Attorney ID No. 41211

**McKINLEY & RYAN, LLC**  
238 West Miner Street  
West Chester, PA 19382  
Telephone (610) 436-6060

**RALPH E. LAMAR**  
4728 Hamilton Blvd.  
Allentown, PA 18103  
(610) 563-0726

**APPROVED BY THE COURT:**

**DATE:**

/s/ Kevin Bradford  
**KEVIN BRADFORD, ESQUIRE**  
Attorney I.D. No. 88576  
**MATTHEW SKOLNIK, ESQUIRE**  
Counsel for Defendants

**OFFICE OF ATTORNEY GENERAL**  
1600 Arch St., Suite 300  
Philadelphia, PA 19103  
Phone: (215) 560-2262

/s/ Jeffrey L. Schmehl  
JEFFREY L. SCHMEHL, J.

August 23, 2023